

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MINHYE PARK,

Index No.: 1:20-cv-02636

Plaintiff,

-against-

DAVID DENNIS KIM, M.D.,

Defendant.
-----X

RULE 37 CERTIFICATION

I hereby certify our firm has attempted to obtain the outstanding discovery that is the subject of this motion by way of our correspondence dated January 12, 2022, in which we requested an extension of time to complete discovery and noted that plaintiff had still not complied with the Defendant's demands addressed in our September 16, 2021 letter motion. On January 28, 2022, plaintiff provided three items of discovery, two of which had already been provided. In correspondence dated February 1, 2022, we again reminded plaintiff that discovery remained outstanding. To date, plaintiff has not provided any additional discovery.

Permission to make this motion was granted by this Court by Order dated January 13, 2022. Defendant's motion to compel discovery is necessary and has been made in good faith.

Respectfully Submitted,



Alejandra R. Gil (AG 7582)

Velazquez, Bernice

From: Velazquez, Bernice
Sent: Friday, February 4, 2022 2:27 PM
To: 'jae@lawjsl.com'
Cc: Gil, Alejandra R.
Subject: Minhye Park v. David Dennis Kim, M.D.; Our File No.: 778-1018; Motion to Dismiss
Attachments: Park- Notice of Motion.pdf; Park- Declaration in Support of Motion to Dismiss.pdf; Park- Memo of Law for Motion to Dismiss.pdf; Park- Rule 37 Certification.pdf; Park - Exhibit N -Plaintiff's Expert Report.PDF; PARK -Exhibit O - Defendant's Letter to Plaintiff dated September 17, 2021.PDF; PARK - Exhibit P - Defendant's Responses to Plaintiff's Interrogatories and Demand for Production of Documents.PDF; Park- Exhibit Q - Plaintiff's Letter to Defendant dated January 28, 2022, regarding deficiencies.pdf; PARK - Exhibit R - Defendant's Letter to Plaintiff dated February 1, 2022, responding to deficiency letter and Defendant's Expert Report.PDF

On behalf of attorney, Alejandra R. Gil, Esq., attached please find the attached as it pertains to the above-referenced matter:

1. Notice of Motion;
2. Declaration in Support of Motion to Dismiss (with Exhibits: N, O, P, Q, and R);
3. Memo of Law for Motion to Dismiss; and
4. Rule 37 Certification.

Thank you.

Bernice Velazquez
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